

# STEVENSON MARINOLLP

Justin R. Marino, Principal d: (212) 939-7228 f: (212) 531-6129  
a: 75 Maiden Lane, Suite 402, New York, NY 10038 e: jmarino@stevensonmarino.com

May 8, 2019

**VIA ECF**

Honorable Roanne L. Mann  
Chief United States Magistrate Judge  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: *Mason et al. v. Lumber Liquidators*  
17-cv-04780 (MKB) (RLM)

Dear Chief Magistrate Judge Mann:

This office represents Plaintiffs in the above-referenced action. Pursuant to Your Honor's Individual Rules, we write jointly with Defendant's counsel to request a 49-day extension of both (i) initial fact discovery, which is presently scheduled to close on May 24, 2019, and (ii) the deadline to submit a joint status report, presently due on May 21, 2019.

The Parties' prior motions for extensions of discovery were based on change in counsel; failed mediation efforts; the sheer amount of discovery involved in this matter coupled with the insufficiency of time in which to review such documentation prior to depositions. *See* Joint Motion (filed Mar. 5, 2019, Dkt 68).

Since the last extension, the undersigned had a death in the family. The Parties are working cooperatively to schedule all remaining depositions, which will take us through July 12. Accordingly, the Parties are optimistic this 49-day extension will enable us to complete the first-stage of discovery (absent any additional discovery required if the fully-briefed conditional certification motion is granted).

Based on the foregoing, the Parties request that the Court extend the close of discovery to July 12, 2019, while also requiring a joint status letter identifying what if any expert discovery and dispositive motions the parties contemplate on July 10, 2019. This is the sixth request for an extension. *See* Joint Motion (filed Mar. 5, 2019, Dkt. 68) (detailing the basis for all prior requests).

The Honorable Roanne L. Mann

May 8, 2019

Page 2 of 2

We thank Your Honor in advance for your consideration of the foregoing.

Respectfully submitted,

**/s/ Justin R. Marino**

Justin R. Marino

cc: Defendant's Counsel (via ECF)